



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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ACTING COMMISSIONER

June 16, 1994

Mr. Fred Evans
Project Manager, Code 1821
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, Penn. 19112-2090

**RE: Draft Proposed Plan Site 9, Neptune Drive Disposal Site, dated May 1993,
Brunswick Naval Air Station, Brunswick, Maine**

Dear Fred:

The Department has received and reviewed the Site 9 Draft Plan for NAS, Brunswick dated May 1993. The Department's comments are provided below.

Generally, this report is very difficult to follow. I don't believe that the general public is going to understand this site by reading this report, and may become even more confused by referencing other documents for much of the information that should be included in this report. It is not clearly stated what problems still exist at the site and what the additional source investigations will involve.

The approach to Site 9 and investigations conducted at Site 9 have changed substantially since the RI/FS reports were submitted. Data collected since the 1990-1991 studies show that some of the original assumptions made about Site 9 are now invalid. Yet, the alternatives presented are based on the FS, which is entirely outdated.

1. Page 1-1, ¶ 1. fourth sentence: It is the Department's position that the interim remedial action for the groundwater operable unit at Site 9 is being conducted to monitor the groundwater at Site 9 while source investigations are performed. It has not been determined what the extent of groundwater contamination is at Site 9 or what the source(s) are for this contamination. The interim remedial action is being proposed to allow movement on the groundwater component of this site from the investigative phase to the remedial action phase to present the appearance that progress is occurring on this site. Apparently, the shift from the investigative phase of the site to a "remedial" phase also allows some additional funding sources to be used for this site. However, simply shifting the groundwater component of this site to an interim remedial phase does nothing to address the as yet unanswered questions regarding this site, specifically, determining potential source areas and the extent of contamination.

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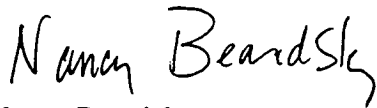
2. Page 1-3, ¶ 1, first sentence: It is not appropriate to refer only to the RI/FS that was performed for this site because there have been additional investigations conducted at this site since the RI/FS was submitted which substantially changed the assumptions about this site.
3. Page 2-1, ¶ 1, second sentence: Consider rewriting this sentence.
4. Page 2-2, ¶ 2, second sentence: Consider adding the Technical Memorandum and the Long-term Monitoring Plan for Site 9 to this list.
5. Page 2-3, ¶ 1, first sentence: Please change July 8, 1994 to August 6, 1994.
6. Page 2-4, ¶ 1, last sentence: Please add "and the MEDEP concurs" or similar language after the word Administrator.
7. Page 2-4, ¶ 2, first sentence: The Technical Memorandums for Site 9 should be added to this list.
8. Page 2-5: Should Mike L'Abbe's name be replaced?
9. Page 3-5, ¶ 3, first sentence: This report does not represent a significant milestone in the remedial process for Site 9. The reasons for moving from the investigative stage to the remedial action phase are discussed in the first comment of this letter.
10. Page 3-8, ¶ 1, first sentence: Consider removing this sentence.
11. Page 3-8, ¶ 1, third sentence: The ash landfill was not investigated as part of the 1990-1991 studies. The ash landfill was not investigated until 1993 after the Department strongly recommended that the ash area be further investigated. The original focus of the investigation was on the septic system south of Neptune Drive. The text should clearly state what areas were investigated during 1990-1991 and what areas were investigated in 1993. The text should include justification for why the investigations in 1993 were performed.
12. Page 3-12, ¶ 2, third sentence: The ash disposal area should be described as the area north of Neptune Drive because it may be confused with the barbecue pit ash that was mentioned in the previous paragraph. Consider moving this sentence to a place after contamination is discussed.
13. Page 3-15, ¶ 1, fifth sentence: The AWQC proposed do not meet the current MEDEP AWQC standards. This issue must be rectified.
14. Page 3-17, ¶ 1, second sentence: This sentence is completely confusing and should be rewritten or removed.

15. Page 3-18, first sentence: Include a sentence that explains that not all wells were sampled and/or analyzed for VOCs during the five RI groundwater sampling rounds. The analytical data that follows in this paragraph is not meaningful without providing all the information available.
16. Page 3-18, third sentence: This sentence is confusing. Please clarify.
17. Page 3-22, ¶ 3, first sentence: The text should provide some explanation why MW-909 and MW-910 were installed.
18. Page 3-29, ¶ 2, second sentence: Water levels were not measured in all wells at Site 9.
19. Page 3-29, ¶ 3: Please add that only one round of sampling was conducted on MW-914, 915, and 916.
20. Page 3-30, ¶ 1, first sentence: Specify what downgradient wells mean. Does one round of sampling results provide sufficient evidence to make any assumptions about the source of VOC contamination?
21. Page 3-31, ¶ 2, first sentence: Consider removing this sentence. It has not been determined that the former incinerator and ash disposal area have not contributed to VOC contamination downgradient of the disposal area. The PAHs found in stream sediments have not been determined to be non-Site 9 related. The PAHs detected are far above background levels.
22. Page 3-31, ¶ 1, last sentence: This sentence must be removed from the text without direct evidence to support the statement.
23. Page 3-31, ¶ 2, second sentence: Maybe its just a matter of semantics, but this plan requires long-term monitoring at Site 9, while investigations are conducted to find potential source areas.
24. Tables 3-2, 3-4, 3-5: One table should be included in this report that includes all of the groundwater data collected to date.
25. Page 4-1, section 4.0: What about the risks associated with the 1993 investigations?
26. Page 4-2, ¶ 2: Include Maine's Incremental Lifetime Cancer Risk guideline of $1.0E-05$.
27. Page 4-4, ¶ 1: This paragraph is very confusing. Please either clarify the paragraph or remove it from the text.

28. Page 4-4, ¶ 2: Where is the discussion involving risks associated with groundwater?
29. Page 4-7: Please explain how a Hazard Index of 6.0 slightly exceeds the acceptable Hazard Index of 1.0. The estimated incremental cancer risk also exceeds Maine's guideline.
30. Page 5-2, ¶ 1, third sentence: This sentence should start a new paragraph.
31. Page 6-1, section 6.0 and page 7-1, section 7.0: These sections reference the FS which does not include any of the investigations conducted in 1993. Is it appropriate to refer to these alternatives since they were developed prior to the additional investigations conducted in 1993? The 1993 studies invalidate much of the information that the FS is based upon.

Please call me with any questions or comments.

Sincerely,



Nancy Beardsley
Project Manager, Federal Facilities Unit
Office of the Commissioner

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